

Name of Defendant: Andrew Sinclair / B4B Earth Tea LLC / B4B Corp  
Address of Defendant: 9703 Sutphin Blvd / Unit 350008  
City, State, Zip: Jamaica NY, 11435  
Phone: 718-635-2135

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

B4B EARTH TEA LLC, a limited liability  
company;  
B4B CORP., a corporation; and

ANDREW MARTIN SINCLAIR, individually  
and as an officer of B4B EARTH TEA LLC and  
B4B CORP.,

Defendant

**DEFENDANT'S FIRST SET OF  
INTERROGATORIES PROPOUNDED  
TO THE PLAINTIFF WITH REQUEST  
FOR PRODUCTION**

**Civil Action No.: 22-CV-1159**

v.

UNITED STATES OF AMERICA

Plaintiff

**INTERROGATORIES**

The Defender requests that the Plaintiff answer under oath, in accordance with Rule 33 of the Federal Rules of Civil Procedure, the following interrogatories.

**INSTRUCTIONS AND DEFINITIONS**

- A. Answers to the Interrogatories must be furnished by the date ordered.
- B. Each Interrogatory should be answered upon your entire knowledge from all sources and all information in your possession or otherwise available to you, including information from your officers, employees, agents, representatives, experts, or consultants and information which is known by each of them. An incomplete or evasive answer is a failure to answer.

C. If any answer is qualified, state specifically the terms of each qualification and the reasons for it. If an Interrogatory cannot be answered in full, state the part which can be answered and answer the same in full to the extent possible; state further and specifically the reason(s) why the remainder cannot be answered.

D. Unless otherwise specified in a particular paragraph , provide the information and documents requested . Exhibits A and B refer to Exhibits A and B attached to the Complaint. Each Interrogatory is considered continuing, and if Plaintiff obtains information which renders its answers or one of them , incomplete or inaccurate , Plaintiff is obligated to serve amended answers on the undersigned.

E. "Customer(s)" "Consumer(s)" means any human being, sole proprietorship, limited partnership, partnership, association, group of human beings, other legal or de facto entity, or corporation, of whatever kind

F. Deceptive means giving an appearance or impression different from the true one; misleading. (meaning used to describe defendant in the lawsuit filed and publicly)

G. (Deceptive / False) advertising is any type of advertising that is false, misleading, or has the effect of deceiving consumers.

H. Well Founded means based on good evidence.

I. Evidence means anything that can be used to prove something.

J. State means express something definitely or clearly in writing.

K. If any Interrogatory may be answered fully by a document, the document may be attached in lieu of an answer if the document is marked to refer to the Interrogatory to which it responds.

## **INTERROGATORIES**

### **INTERROGATORY NO. 1**

State name of all Witnesses, Order numbers, payment used, social media account used to interact with Defendant ,WhatsApp number, or identification used during communications.

### **INTERROGATORY NO. 2**

List all names and order numbers of customers / consumers who reported fraud and their reason for purchase.

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INTERROGATORY NO.3

List all names and order numbers of customers / consumers who reported being scammed and their reason for purchase.

INTERROGATORY NO.4

List all names and order numbers of customer / consumers who reported deception and their reason for purchase.

INTERROGATORY NO.5

State if Plaintiff intercepted any shipment send by defendant via USPS or UPS.

INTERROGATORY NO.6

Plaintiff claimed accusations are well founded please state why and provide documented evidence to support Plaintiff's well founded claims.

INTERROGATORY NO.7

Outline in details test, research or provide evidence that was done to supports Plaintiff's claims of false advertising and deceptive advertising.

INTERROGATORY NO.8

State yes or no if from March 2020 to March 2022, Natural supplement are required by law to be registered before going to market.

INTERROGATORY NO.9

State if natural products are required by law to conduct clinical trials, or proven safe and effective to the FDA before going to market.

INTERROGATORY NO.10

Present specific evidence of deception, with lab result, research results or independent lab analysis done to support deceptive claims mentioned numerous times in Plaintiff accusations.

#### INTERROGATORY NO.11

Present evidence such as research, lab result or any testing, that supports misrepresentation claim stated in paragraph 27 in plaintiff complaint.

#### INTERROGATORY NO.12

Present communication evidence, with India's clinical trial department that supports Plaintiff's claim that Clinical trial done by defendant is fake.

#### INTERROGATORY NO.13

Present competent, reliable scientific evidence that counter defendants posts brought forward, in paragraph 1 of lawsuit filed. Show evidence that supports plaintiff claims. Plaintiff specifically claimed (Defendant lack competent , and reliable scientific bases for these claims and their use of "deceptive advertising and misinformation" poses a risk to public health and safety.

#### INTERROGATORY NO.14

State Yes or No if the following statement is true from the FDA website page titled "FDA 101 Dietary Supplement : (Federal law does not require dietary supplements to be proven safe to FDA satisfactory before they are marketed)

#### INTERROGATORY NO.15

State Yes or No if the following statement is true from the FDA website , page titled "FDA 101 : Dietary Supplement"(Some dietary supplement have been shown to be beneficial for certain health conditions.)

#### INTERROGATORY NO.16

State if the FDA conducted any test or trial with the product Earth Tea Extra Strength against any issue  
. please provide the results, source of samples and methods used to generate results.

#### INTERROGATORY NO.17

State if Earth Tea Extra Strength was ever tested for any illegal or prohibited substances and what was the result.

**INTERROGATORY NO.18**

State if any social media platform was asked to block, ban or and remove any content or sensor B4B Earth Tea content

**INTERROGATORY NO.19**

State what specifically pertaining to Earth Tea Extra Strength is considered unfair, deceptive or affecting commerce, (stated in the lawsuit filed).

**INTERROGATORY NO.20**

Provide at least one evidence that justifies false advertising stated multiple times in the lawsuit. ( evidence that proves content is false)

**INTERROGATORY NO. 21**

State if all witnesses are government employees.

**INTERROGATORY NO. 22**

State if your experts tested or try Earth Tea Extra Strength, if yes provide medical report or research results that proves statements that your expert will dictate to the court is specifically about Earth Tea Extra Strength.

**INTERROGATORY NO. 23**

State if there's any known registered product that successfully or guaranteed to support humans immune system. As of October 2023

**INTERROGATORY NO. 24**

State if the FDA have the capability to detect illegal or prohibited substances in liquid

**INTERROGATORY NO. 25**

State if as of October 2023 it is illegal to have an home based juice or food business in America.

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Date: October 11, 2023

A handwritten signature in black ink, appearing to read "Andrew Sinclair", is written over a horizontal line.

Andrew Sinclair / B4B Earth Tea LLC /  
B4B Corp.

Defendant

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Telephone: 718-635-2135